

JUDGE KATHLEEN CARDONE

FILED

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

2016 DEC -7 PM 3: 12

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

BY [Signature] DEPUTY

UNITED STATES OF AMERICA,

§

INDICTMENT

§

Plaintiff,

§

Criminal No. EP-16-CR-

§

v.

§

COUNT 1: 18 U.S.C. § 1030(a)(5)(B))

§

Damage to a Protected Computer

§

CARLOS EDUARDO CASILLAS,

§

COUNT 2: 18 U.S.C. § 1030 (a)(2)

Defendant.

§

Obtaining Information from a Protected  
Computer

§

§

Notice of Government's Demand for  
Forfeiture

§

**EP 16 CR 2198**

THE GRAND JURY CHARGES:

COUNT ONE

(18 U.S.C. §§ 1030(a)(5)(B) and (c)(4)(A))

On or about June 7, 2015, in the Western District of Texas, the defendant,

**CARLOS EDUARDO CASILLAS,**

intentionally accessed a protected computer without authorization, and as a result of such conduct, recklessly caused damage, and the offense caused loss to persons during a 1-year period from the defendant's course of conduct affecting a protected computer aggregating at least \$5,000 in value, in violation of 18 U.S.C. §§ 1030(a)(5)(B) and (c)(4)(A).

COUNT TWO

(18 U.S.C. § 1030 (a)(2) and (c)(2)(B)(ii))

On or about June 7, 2015 in the Western District of Texas, Defendant,

**CARLOS EDUARDO CASILLAS,**

intentionally accessed a computer without authorization, and exceeded authorized access to a computer, and thereby obtained information from a protected computer and the offense was committed in furtherance of a criminal and tortious act in violation of the laws of the State of Texas, specifically theft of property, in violation of 18 U.S.C. §1030(a)(2) and (c)(2)(B)(ii).

**NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE**  
(18 U.S.C. §§ 982(a)(2)(B) and 1030(i))

As a result of the offenses in violation of Title 18, United States Code, Section 1030 charged in Counts One and Two of this Indictment, the United States of America gives notice to the defendant,

**CARLOS EDUARDO CASILLAS,**

of its intent to seek forfeiture to the United States, pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1030(i)(1)(B), of any and all property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such offenses, and pursuant to Title 18, United States Code, Section 1030(i)(1)(A), of any and all personal property that was used or intended to be used to commit or to facilitate the commission of the offenses, including but not limited to the following:

- a. A sum of money in United States currency representing the amount of proceeds generated by the offenses.
- b. An iPad mini Model #A1489 bearing Serial Number F4KLQ11SFH13 w/case, and Internal Seagate IDE 500 GB drive bearing Serial Number 9QG6PVYQ.
- c. A SanDisk Cruzer Glide 64gb BN141024774B also had #SDCZ60064G;
- d. A SanDisk USB thumb drive BEO710AIYB, also had SDCZ62048RB;
- e. A Seagate external USB, External Hard Drive, NAOB41FA;
- f. A Micro SD, Serial #HSP04GMASSM, a Kingston and 2 Sandisk adapters;
- g. An SDHC Deolux 8GB, SD Memory Card;

- h. A SanDisk USB thumb drive bearing Serial Number SDCZ60064G;
- i. A Dell PowerEdge 2900 server, Model #ECM01 bearing Serial Number GJ157C1;
- j. A Black Lenovo B-50-45, Model Name 20388 bearing Serial Number CB35328155, with charger; and
- k. A silver/black HP laptop, Model #DV7-4285DX, Serial #CNF0496WD3, with charger.

**Substitute Assets Provision**

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b) and 1030(i)(2), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

A TRUE ~~ORIGINAL~~ SIGNATURE  
REDACTED PURSUANT TO  
E-GOVERNMENT ACT OF 2002

\_\_\_\_\_  
GRAND JURY FOREPERSON

RICHARD L. DURBIN, JR.  
UNITED STATES ATTORNEY

By  \_\_\_\_\_  
Assistant United States Attorney